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LIFE AND ACCIDENT INSURANCE
COMPANY and UNUM GROUP

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JONATHAN COHAN, M.D., formerly
known as Jonathan Baktari, M.D.,

Plaintiff,

vs.

Case No. 2:13-cv-00975-LDG-CWH

PROVIDENT LIFE AND ACCIDENT
INSURANCE CO., a foreign insurer,
and UNUM GROUP, a Delaware
Corporation, (d/b/a, inter alia, Provident
Life and Accident Insurance Company,
The Paul Revere Life Insurance Company,
and Unum Life Insurance Company),

Defendants.

**JOINT REQUEST TO CONTINUE THE DATE SET FOR THE
FILING OF THE PARTIES' PRETRIAL ORDER**
(First Request)

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COMES NOW the parties, by and through their respective undersigned counsel of record, and hereby jointly move the Court for an Order continuing the date presently set for the filing of their Joint Pretrial Order for a period of seventy-seven (77) days from October 30, 2015, to January 15, 2016, which will be thirty (30) days subsequent to a private mediation the parties have scheduled for December 15, 2015.

This request is made and based upon the following facts and representations:

1. That pursuant to an Order entered by Magistrate Judge Hoffman on July 30, 2014, the parties' Joint Pretrial Order is due to be filed thirty (30) days after this Court's decision on the parties' then-pending Motions for Summary Judgment [Dkt. 110].

2. On September 30, 2015, the Court entered an Order denying Plaintiff's Motion for Summary Judgment and granting in part and denying in part Defendants' Motion for Summary Judgment; accordingly, the parties' Joint Pretrial Order is presently due to be filed by October 30, 2015 [Dkt. 252].

3. That based upon the Court's decision on the parties' Motions, the parties now believe that there is a real likelihood that they will be able to resolve all remaining issues between them in a private mediation.

4. That preparing a Joint Pretrial Order in this matter would be a time consuming and costly endeavor that the parties would like to avoid if at all possible.

5. That the parties have scheduled a private mediation with retired Judge Philip Pro for December 15, 2015, and believe that the mediation will go forward on that date.

6. That this is the first request of the parties to continue the date set for the filing of their Joint Pretrial Order.

7. That this request is made in good faith and not merely for the purposes of delay.

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WHEREFORE, the parties jointly request that this Honorable Court enter an Order continuing the date set for the filing of their Joint Pretrial Order for a period of seventy-seven (77) days from October 30, 2015, to January 15, 2016.

Respectfully submitted this 29th day of October, 2015.

LAW OFFICE OF
JULIE A. MERSCH

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BY: /s/ Walter R. Cannon
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Attorney for Defendants

ORDER

IT IS SO ORDERED.

DATED: 29 October 2015


UNITED STATES DISTRICT JUDGE
LLOYD D. GEORGE

Respectfully submitted,

OLSON, CANNON, GORMLEY
ANGULO & STOBERSKI

BY: /s/ Walter R. Cannon
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